

Samuel Heins, Esq.
Bryan L. Crawford, Esq.
Daniel E. Gustafson, Esq.
HEINS, MILLS & OLSON, P.C.
3550 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
Telephone: (612) 338-4605
Facsimile: (612) 338-4692

Marc H. Edelson, Esq.
HOFFMAN & EDELSON
45 West Court Street
Doylestown, PA 18901
Telephone: (215) 230-8043
Facsimile: (215) 230-8735

Kenneth A. Wexler, Esq.
Elizabeth Fegan Hartweg, Esq.
THE WEXLER FIRM
One North LaSalle Street, Suite 2000
Chicago, IL 60602
Telephone: (312) 346-2222
Facsimile: (312) 346-0022

Eugene A. Spector, Esq.
Jeffrey L. Kodroff, Esq.
John A. Macoretta, Esq.
SPECTOR, ROSEMAN & KODROFF, P.C.
1818 Market Street, Suite 2500
Philadelphia, PA 19103
Telephone: (215) 496-0300
Facsimile: (215) 496-6611

ON BEHALF OF DEFENDANTS

By /s/ Nicholas C. Theodorou
Nicholas C. Theodorou, Esq. (BBO# 496730)
Jessica Barnett, Esq. (BBO# 650535)
FOLEY HOAG, LLP
155 Seaport Boulevard
Boston, MA 02210

DATED: February 1, 2006

D. Scott Wise, Esq. (admitted *pro hac vice*)
Kimberley Harris, Esq. (admitted *pro hac vice*)

DAVIS POLK & WARDWELL

450 Lexington Avenue
New York, NY 10017

Attorneys for Defendant AstraZeneca
Pharmaceuticals LP

CERTIFICATE OF SERVICE

I hereby certify that I, Thomas M. Sobol, an attorney, caused a true and correct copy of the foregoing **Status Report** to be served on all counsel of record electronically on February 1, 2006 pursuant to Section D of Case Management Order No. 2.

/s/ Thomas M. Sobol

Thomas M. Sobol, Esq.

HAGENS BERMAN SOBOL SHAPIRO LLP

One Main Street, 4th Floor

Cambridge, MA 02142

Telephone: (617) 482-3700

Facsimile: (617) 482-3003

MDL 1456 STATUS CHART – GOVERNMENT ENTITY CASES

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
Montana v. Abbott Labs., Inc. et al.	02-CV-12084-PBS	Removed to D. Mont.	<ul style="list-style-type: none"> • December 7, 2005 – Defendants’ Emergency Motion for an Order Holding Plaintiffs in Contempt, for Preservation of Potentially Relevant Documents, and for an Accounting of Spoliated Documents (re: Montana and Nevada) <ul style="list-style-type: none"> ○ December 7, 2005 – Defendants’ Motion for Expedited Briefing Schedule and Oral Argument on Defendants’ Motion for an Order Holding Plaintiffs in Contempt, for Preservation of Potentially Relevant Documents, and for an Accounting of Spoliated Documents ○ December 8, 2005 – Opposition of the States of Nevada and Montana to Defendants’ Motion for Expedited Briefing Schedule and Oral Argument on Defendants’ Motion for an Order Holding Plaintiffs in Contempt, for Preservation of Potentially Relevant Documents, and for an Accounting of Spoliated Documents ○ December 12, 2005 – Defendants’ Motion for Leave to File Reply Memorandum in Support of Motion Expedited Briefing Schedule and Oral Argument on Defendants’ Motion for an Order Holding Plaintiffs in Contempt, for Preservation of Potentially Relevant Documents, and for an Accounting of Spoliated Documents ○ December 15, 2005 – Opposition of the States of Nevada and Montana to Defendants’ Motion for Leave to File Reply Memorandum in Support of Motion Expedited Briefing Schedule and Oral Argument on Defendants’ Motion for an Order Holding Plaintiffs in Contempt, for Preservation of Potentially Relevant Documents, and for an Accounting of Spoliated Documents ○ December 21, 2005 – Opposition of the States of Nevada and Montana to Defendants’ Motion for an Order Holding Plaintiffs in Contempt, for Preservation of Potentially Relevant Documents, and for an Accounting of Spoliated Documents ○ January 6, 2006 – Defendants’ Motion for Leave to File a Reply Brief in Support of Their Emergency Motion for an Order Holding Plaintiffs in Contempt, for Preservation of Potentially Relevant Documents, and for an Accounting of Spoliated Documents ○ January 6, 2006 – Defendants’ Reply Brief in Support of Their

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
			<p>Emergency Motion for an Order Holding Plaintiffs in Contempt, for Preservation of Potentially Relevant Documents, and for an Accounting of Spoliated Documents</p> <ul style="list-style-type: none"> ○ January 11, 2006 – Opposition of the States of Nevada and Montana to Defendants’ Motion for Leave to File a Reply Brief in Support of Their Emergency Motion for an Order Holding Plaintiffs in Contempt for Preservation of Potentially Relevant Documents and for an Accounting of Spoliated Documents • January 31, 2006 – Defendants’ Motion to Compel Discovery from Plaintiffs State of Nevada And State of Montana • January 31, 2006 – Motion of Defendants to Amend CMO No. 15 <ul style="list-style-type: none"> ○ January 31, 2006 – Defendants Baxter International Inc. and Baxter HealthCare Corporation’s Motion for Reconsideration of Order Denying Joint Motion to Amend CMO No. 15
Nevada v. American Home Products, Inc. et al (“Nevada II”)	02-CV-12086-PBS	Removed to D. Nev.	<ul style="list-style-type: none"> • December 7, 2005 – Defendants’ Emergency Motion for an Order Holding Plaintiffs in Contempt, for Preservation of Potentially Relevant Documents, and for an Accounting of Spoliated Documents (re: Montana and Nevada, see entry under <i>Montana v. Abbott Labs., Inc. et al.</i>) • January 31, 2006 – Defendants’ Motion to Compel Discovery from Plaintiffs State of Nevada And State of Montana • January 31, 2006 – Motion of Defendants to Amend CMO No. 15 <ul style="list-style-type: none"> ○ January 31, 2006 – Defendants Baxter International Inc. and Baxter HealthCare Corporation’s Motion for Reconsideration of Order Denying Joint Motion to Amend CMO No. 15

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
California ex rel. Ven-A-Care of the Florida Keys, Inc. v. Abbott Labs., Inc. et al.	03-CV-11226-PBS	Removed to C.D. Cal.	<ul style="list-style-type: none"> • August 25, 2005 – First Amended Complaint in Intervention for Money Damages and Civil Penalties for Violations of the California False Claims Act • September 12, 2005 – Relator Ven-A-Care's Motion For Leave to File Under Seal Relator's Notice of Election and Notice of Dismissal • October 6, 2005 – Motion for Entry of Joint Stipulation to Stay the Deadline for Defendant Abbott Laboratories Inc. to Respond to the First Amended Complaint in Intervention <ul style="list-style-type: none"> ○ January 27, 2006 – State of California's Motion to File Under Seal and Impound Until Further Order of this Court: Stipulation and Proposed Order to Extend Seal of Relator's First Amended Complaint in Intervention • January 17, 2006 – Defendants' Motion to Dismiss the First Amended Complaint in Intervention (<i>individual memoranda of law submitted by ZLB Behring LLC and Abbott Laboratories Inc.</i>) <ul style="list-style-type: none"> ○ January 17, 2006 – B. Braun of America Inc.'s Motion to Dismiss the State of California's First Amended Complaint
Illinois v. Abbott Laboratories, Inc., Case No. 05-C-4056; Kentucky v. Abbott Laboratories, Inc., Case No. 3:05-CV-48; Kentucky v. Warrick Pharmaceuticals Corp., Case No. 05-CV-49; Kentucky v. Alpharma Inc., Case No. 05-CV-47-KKC; New York v. Aventis, Case No. 05-CV-873; New York v. GlaxoSmithKline PLC, Case No. 05-CV-874; New York v. Pharmacia Corp., Case No. 05-CV-872;	n/a	Removed to N.D. Ill. Removed to E.D. Ky. Removed to E.D. Ky. Removed to E.D. Ky. Removed to N.D.N.Y. Removed to N.D.N.Y. Removed to N.D.N.Y.	<ul style="list-style-type: none"> • July 13, 2005 – Notices of Removal filed (based on <i>Grable & Sons Metal Prods., Inc. v. Darue Eng'g & Mfg.</i>, 125 S. Ct. 2363 (June 13, 2005))

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
Florida ex rel. Ven-A-Care of the Florida Keys v. Alparma, Inc. et al., Case No. 05-257		Removed to N.D. FL	<ul style="list-style-type: none"> • Motion to Remand in Florida v. Alparma, Inc. (05-257) filed but not briefed prior to transfer <ul style="list-style-type: none"> ○ September 16, 2005 – Plaintiffs’ Memorandum of Law in Support of Motion for Remand filed in D. Mass. ○ October 14, 2005 – Defendants’ Memorandum of Law in Opposition to Plaintiffs’ Motion for Remand to State Circuit Court ○ November 18, 2005 – Endorsed Request for International Judicial Assistance (Letter Rogatory) • January 11, 2006 – Conditional Transfer Order transferring <i>State of Florida, et al. v. Mylan Laboratories, Inc., et al.</i>, N.D. Fla., C.A. No. 4:05-490 <ul style="list-style-type: none"> ○ January 26, 2006 – Notice of Opposition to proposed transfer filed by Florida Attorney General ○ January 27, 2006 – Motion and Brief to Vacate the CTO must be received by JPML no later than February 10, 2006
County of Nassau v. Abbott Labs., Inc. et al.	n/a	E.D.N.Y.	<ul style="list-style-type: none"> • January 6, 2006 – County of Nassau’s Motion for Leave to File a Second Amended Complaint and to File Under Seal <ul style="list-style-type: none"> ○ January 25, 2006 – Defendants’ Response to County of Nassau’s Amended Motion for Leave to File a Second Amended Complaint

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
Consolidated County Case: City of New York (S.D.N.Y.) County of Albany (N.D.N.Y.) County of Allegany (W.D.N.Y.) County of Broome (N.D.N.Y.) County of Cattaraugus (W.D.N.Y.) County of Cayuga (N.D.N.Y.) County of Chautauqua (W.D.N.Y.) County of Chenango (N.D.N.Y.) County of Columbia (N.D.N.Y.) County of Cortland (N.D.N.Y.) County of Dutchess (S.D.N.Y.) County of Essex (N.D.N.Y.) County of Fulton (N.D.N.Y.) County of Genesee (W.D.N.Y.) County of Greene (N.D.N.Y.) County of Herkimer (N.D.N.Y.) County of Jefferson (N.D.N.Y.) County of Lewis (N.D.N.Y.) County of Madison (N.D.N.Y.) County of Monroe (W.D.N.Y.) County of Niagara (N.D.N.Y.) County of Oneida (N.D.N.Y.) County of Onondaga (N.D.N.Y.) County of Ontario (W.D.N.Y.) County of Orleans (W.D.N.Y.) County of Putnam (S.D.N.Y.) County of Rensselaer (N.D.N.Y.) County of Rockland (S.D.N.Y.) County of St. Lawrence (N.D.N.Y.) County of Saratoga (N.D.N.Y.) County of Schuyler (W.D.N.Y.) County of Seneca (W.D.N.Y.) County of Steuben (W.D.N.Y.) County of Suffolk (E.D.N.Y.) County of Tompkins (N.D.N.Y.) County of Warren (N.D.N.Y.) County of Washington (N.D.N.Y.) County of Wayne (W.D.N.Y.)	n/a	E.D.N.Y. N.D.N.Y. S.D.N.Y. W.D.N.Y.	<ul style="list-style-type: none"> • March 30, 2005 – County of Suffolk’s Motion to Renew Its Second Motion to Compel the Production of Discovery From the Schering-Plough Corporation <i>sub judice</i> (Magistrate Judge Bowler) <ul style="list-style-type: none"> ○ April 6, 2005 – Schering Plough’s Opposition to County of Suffolk’s Motion to Renew Its Second Motion to Compel the Production of Discovery • June 15, 2005 – Redacted Consolidated Complaint filed in the United States District Court for the District of Massachusetts <ul style="list-style-type: none"> ○ June 15, 2005 – Plaintiffs’ Motion for Leave to File Consolidated Complaint Under Seal ○ June 22, 2005 – Corrected Consolidated Complaint filed in the United States District Court for the District of Massachusetts ○ June 23, 2005 – Motion for Leave to File Consolidated Complaint Under Seal Denied. Defendants seeking redactions ordered to file affidavits within ten days. ○ July 8, 2005 – Order modifying June 23, 2005 Order and extending time to file affidavits. ○ October 4, 2005 – Defendants’ Request for Extension of Time and Further Relief in Order to Comply with July 8, 2005 Order <ul style="list-style-type: none"> • October 19, 2005 – Plaintiffs’ Response to Defendants’ Request for Extension of Time and Further Relief in Order to Comply with July 8, 2005 Order, Filed Under Seal • January 5, 2006 – Joint Motion of Plaintiffs and Defendants for Entry of Case Management Order 20 Relating to New York Cases

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
County of Westchester (S.D.N.Y.) County of Yates (W.D.N.Y.)			

MDL 1456 STATUS CHART – PRIVATE CLASS CASES

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
Master Consolidated Class Action	Master File 01-CV-12257-PBS	D. Mass. pursuant to JPML Order	<ul style="list-style-type: none"> • May 3, 2004 – Plaintiffs’ Motion to Compel the Production of Documents Created During the Relevant Time Period from Defendants Abbott Laboratories, AstraZeneca, Schering Plough, Sicor and Together Rx Defendants <i>sub judice</i> (Magistrate Judge Bowler) <ul style="list-style-type: none"> ○ May 17, 2004 – Certain Defendants’ Notice of Opposition to Plaintiffs’ Motion to Compel the Production of Certain Documents and Consent Motion for an Extension of Time ○ May 26, 2004 – Notice of Withdrawal of Plaintiffs’ Motion to Compel the Production of Documents Created During the Relevant Time Period Directed at Defendant Schering–Plough (<i>Note: withdrawal applies only to Schering-Plough</i>) ○ May 27, 2004 – Consent Motion for an Extension of Time to Oppose the Motion to Compel ○ May 27, 2004 – Opposition of the Together Rx Defendants to Plaintiffs’ Motion to Compel the Production of Documents ○ May 28, 2004 – Notice of Withdrawal of Plaintiffs’ Motion to Compel the Production of Documents Created During the Relevant Time Period Directed at Defendant Abbott Laboratories (<i>Note: withdrawal applies only to Abbott Laboratories</i>) ○ June 8, 2004 – Notice of Withdrawal of Plaintiffs’ Motion to Compel the Production of Documents Created During the Relevant Time Period Directed at Defendant AstraZeneca. (<i>Note: withdrawal applies only to AstraZeneca</i>) ○ June 9, 2004 – Plaintiffs’ Reply Memorandum in Support of Motion to Compel the Production of Documents Created During the Relevant Time Period from the Together Rx Defendants ○ June 22, 2004 – Order granting Plaintiffs’ Motion to Withdraw Motion to Compel Directed at Abbott Laboratories ○ Awaiting scheduling of hearing or ruling by Court as to Together Rx Defendants • February 23, 2005 – Third Party Schaller Anderson Inc.’s Objection and Motion to Quash Plaintiffs’ Subpoena • June 14, 2005 – Defendant Sicor Inc. and Sicor Pharmaceuticals, Inc.’s Motion for Protective Order with Memorandum in Support <i>sub judice</i> (Magistrate Judge Bowler)

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
Master Consolidated Class Action (continued)			<ul style="list-style-type: none"> ○ June 28, 2005 – Plaintiffs’ Response to Sicor’s Motion for Protective Order ○ July 7, 2005 – Motion for Leave to File Reply to Plaintiffs’ Response to Sicor’s Motion for Protective Order • August 26, 2005 – Empire Blue Cross Blue Shield’s Motion to Quash Subpoena Seeking Deposition Testimony and For a Protective Order <i>sub judice</i> <ul style="list-style-type: none"> ○ September 9, 2005 – Defendants’ Memorandum in Opposition to Empire Blue Cross Blue Shield’s Motion to Quash Subpoena Seeking Deposition Testimony and For a Protective Order ○ September 20, 2005 – Non Party Empire Blue Cross Blue Shield’s Assented to Motion for Leave to File Reply Memorandum of Law In Further Support of Motion to Quash Subpoena Seeking Deposition Testimony and for Protective Order ○ September 20, 2005 – Non Party Empire Blue Cross Blue Shield’s Memorandum in Further Support of its Motion to Quash Subpoena Seeking Deposition Testimony and for a Protective Order ○ January 9, 2006 – Hearing Set Before Magistrate Judge Bowler for February 2, 2006 • October 12, 2005 – Defendants’ Motion to Compel Third Party United Healthcare to Produce Documents and Witnesses for Deposition Pursuant to Subpoena <ul style="list-style-type: none"> ○ October 26, 2005 – United Healthcare, Inc. and United Healthcare Insurance Company’s Consolidated Memorandum of Law in Opposition to Defendants’ Motion to Compel ○ January 9, 2006 – Hearing Set Before Magistrate Judge Bowler for February 2, 2006 • October 21, 2005 – Plaintiffs’ Motion to Compel Production of IMS Data and Reports <i>sub judice</i> <ul style="list-style-type: none"> ○ November 4, 2005 – Track One Defendants’ Memorandum in Opposition to Plaintiffs’ Motion to Compel Production of IMS Data and Reports ○ January 9, 2006 – Hearing Set Before Magistrate Judge Bowler for February 2, 2006 • October 28, 2005 – Plaintiffs’ Motion to Compel Production by Amgen,

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
<p>Master Consolidated Class Action (continued)</p>			<p><i>Inc. sub judice</i></p> <ul style="list-style-type: none"> ○ November 7, 2004 – Amgen Inc.’s Opposition to Plaintiffs’ Motion to Compel Discovery ○ January 9, 2006 – Hearing Set Before Magistrate Judge Bowler for February 2, 2006 <p>• November 9, 2005 – Plaintiffs’ Motion for Order Exempting Defendant Abbott Laboratories from Any Order Refusing to Extend Deadline for Track Two Discovery</p> <ul style="list-style-type: none"> ○ November 23, 2005 – Defendant Abbott Laboratories’ Opposition to Plaintiffs’ Motion for Order Exempting Defendant Abbott Laboratories from Any Order Declining to Extend Deadline for Track Two Discovery ○ December 1, 2005 – Plaintiffs’ Letter to Magistrate Judge Bowler Requesting Postponement of Hearing until Track Two Discovery Issues Resolved <p>• November 23, 2005 – Plaintiffs’ Motion for a Protective Order re: Subpoenas Issued by Dey, Inc. to Tufts Associated Health Plans, Inc. and Neighborhood Health Plan, Inc.</p> <ul style="list-style-type: none"> ○ November 25, 2005 – Plaintiffs’ Motion for a Protective Order re: Subpoenas Issued by Defendant Dey to Fallon Community Health Plan and Defendant Abbott Laboratories to Harvard Community Health Care ○ November 25, 2005 – Non-Party Tufts Associated Health Plans, Inc.’s Motion for Protective Order ○ November 29, 2005 – Non-Party Neighborhood Health Plan, Inc.’s Motion for Protective Order and to Quash Subpoena from Defendant Dey, Inc. ○ November 29, 2005 – Dey, Inc. and Abbott Laboratories’ Memorandum of Law In Opposition to Plaintiffs’ Motions for a Protective Order Concerning Subpoenas Issued to Certain Absent Class Member Third-Party Payors ○ November 30, 2005 – Plaintiffs’ Reply Memorandum for a Protective Order Concerning Notices of Deposition and Subpoenas Issued by Dey to Fallon Community Health Plan and Abbott Laboratories to Harvard Community Health Care ○ December 6, 2005 – Defendant Dey, Inc.’s Memorandum of Law in Opposition to Non-Party Tufts Associated Health Plans, Inc.’s

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
Master Consolidated Class Action (continued)			<ul style="list-style-type: none"> <ul style="list-style-type: none"> ○ Motion for Protective Order ○ December 13, 2005 – Defendant Dey, Inc.’s Memorandum of Law in Opposition to Non-Party Neighborhood Health Plan, Inc.’s Motion for Protective Order and to Quash Subpoena from Dey, Inc. ○ January 5, 2006 – Non-Party Fallon Community Health Plan, Inc.’s Motion to Stay Discovery ○ January 9, 2006 – Hearing Set Before Magistrate Judge Bowler for February 2, 2006 ○ January 23, 2006 – Defendant Dey, Inc.’s Memorandum of Law in Opposition to Non-Party Fallon Community Health Plan, Inc.’s Motion to Stay Discovery ○ January 27, 2006 – Non-Party Neighborhood Health Plan, Inc.’s Motion for Leave to File Supplemental Affidavit in Support of Motion for Protective Order and to Quash Subpoena from Defendant Dey, Inc. ○ January 27, 2006 – Non-Party Fallon Community Health Plan, Inc.’s Motion to Quash the Subpoena of Defendant Dey, Inc. ● November 28, 2005 – Plaintiffs’ Motion for Clarification of Case Management Order #16 <ul style="list-style-type: none"> ○ November 30, 2005 – Response of Defendant Watson Pharma, Inc. to Plaintiffs’ “Motion for Clarification of Case Management Order #16” ○ November 30, 2005 – Certain Track II Defendants’ Request for Expedited Hearing ○ December 1, 2005 – Order re: Plaintiffs’ Motion for Clarification of Case Management Order #16 ○ December 9, 2005 – Track II Defendants’ Submission Regarding Discovery Schedule ○ December 9, 2005 – Watson Pharmaceuticals, Inc.’s Response to Court Order Regarding Discovery Schedule ○ December 9, 2005 – Defendants Baxter Healthcare Corporation and Baxter International Inc.’s Memorandum Regarding Track II Discovery Schedule ○ December 9, 2005 – Plaintiffs’ Memorandum in Support of Their Proposed Track II Discovery Schedule ○ December 15, 2005 – Plaintiffs’ Reply to Watson Pharmaceuticals, Inc.’s Response to Court Order Regarding Discovery Schedule ○ December 16, 2005 – Watson Pharmaceuticals, Inc.’s Motion for

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
Master Consolidated Class Action (continued)			<p>Leave to File Reply Memorandum in Support of Its Response to Court Order Regarding Discovery Schedule</p> <ul style="list-style-type: none"> • January 18, 2006 – Plaintiffs’ Motion to Compel Third-Party AmeriSource Bergen Corp. to Produce Deponent(s) Pursuant to Fed. R. Civ. P. 30(B)(6) and Fed. R. Civ. P. 45 <ul style="list-style-type: none"> ○ January 18, 2006 – Plaintiffs’ Motion for Leave to File Under Seal Memorandum in Support of Their Motion to Compel Third-Party AmeriSource Bergen Corporation to Produce Deponent(s) Pursuant to Fed. R. Civ. P. 30(B)(6) and Fed. R. Civ. P. 45 Under Seal ○ January 31, 2006 – Non-Party AmeriSource Bergen Corporation’s Motion for Leave to File Under Seal
International Union of Operating Engineers, Local No. 68 Welfare Fund v. AstraZeneca PLC et al.	04-11503-PBS	Removed to D.N.J.	<ul style="list-style-type: none"> • Motion to Remand filed in District of New Jersey prior to transfer; briefed while pending in District of New Jersey <ul style="list-style-type: none"> ○ April 22, 2005 – Supplemental Brief in Support of Motion for Remand by Plaintiff International Union of Operating Engineers Local No. 68 Welfare Fund ○ May 3, 2005 – Rejection of Supplemental Brief in Support of Motion for Remand by Plaintiff International Union of Operating Engineers Local No. 68 Welfare Fund ○ May 6, 2005 – Supplemental Brief in Opposition to Motion for Remand by Plaintiff International Union of Operating Engineers Local No. 68 Welfare Fund due to be filed ○ June 1, 2005 – Supplemental Brief in Support of Motion for Remand by Plaintiff International Union of Operating Engineers Local No. 68 Welfare Fund re-filed ○ July 20, 2005 – Notice of Supplemental Authority ○ August 19, 2005 – Memorandum and Order: AstraZeneca Shall Submit an Affidavit Explaining Factual Basis for Statement in Notice of Removal within 30 days; and All Discovery on Fraudulent Joinder Claims Shall be Completed within 60 days ○ September 19, 2005 – Response of AstraZeneca Pharmaceuticals LP (Attaching Declaration of Scott Wise with Exhibits) Filed in Response to Court Order Dated August 19, 2005 ○ September 29, 2005 – Motion by Plaintiff, International Union of Operating Engineers, Local No. 68 Welfare Fund for Immediate Remand Based Upon Declarations of Defense Counsel or, in the Alternative, Motion to Reconsider Memorandum and Order of

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
International Union of Operating Engineers, Local No. 68 Welfare Fund v. AstraZeneca PLC et al (continued)			<ul style="list-style-type: none"> August 19, 2005 <ul style="list-style-type: none"> ○ October 12, 2005 – Memorandum of Law in Opposition to Motion by Plaintiff, International Union of Operating Engineers, Local No. 68 Welfare Fund for Immediate Remand Based Upon Declarations of Defense Counsel or, in the Alternative, Motion to Reconsider Memorandum and Order of August 19, 2005 ○ December 28, 2005 – AstraZeneca Pharmaceutical’s Second Supplemental Memorandum of Law in Opposition to Motion for Remand by Plaintiff International Union of Operating Engineers, Local No. 68 Welfare Fund ○ January 24, 2006 – Opposition by Local 68 to Defendants’ Second Supplemental Memorandum of Law in Opposition to Remand ○ February 10, 2006 – Final submissions due • October 28, 2005 – Notice of Voluntary Dismissal of Lupron Related Claims with Prejudice by Plaintiff, International Union of Operating Engineers, Local No. 68 Welfare Fund • January 30, 2006 – AstraZeneca’s Notice of Proposed Order Pursuant to the Court’s January 27, 2006 Rulings <ul style="list-style-type: none"> ○ January 31, 2006 – Notice of Opposition to Proposed Order Presented by AstraZeneca Pharmaceuticals LP Respecting the Court’s January 27, 2006 Rulings, and Submission of Alternative Form of Order ○ January 31, 2006 – Statement Regarding Plaintiff’s Opposition to Form of Order Submitted by AstraZeneca Pursuant to the Court’s January 27, 2006 Rulings
Government Employees Hospital Association v. Serono International, S.A. et al	05-11935-NMG	D. Mass.	<ul style="list-style-type: none"> • September 23, 2005 – Class Action Complaint filed <ul style="list-style-type: none"> ○ November 21, 2005 – First Amended Class Action Complaint Filed Against Serono International, S.A., Serono Laboratories, Inc., Serono, Inc., RJI Systems, Inc., and Rudolph J. Liedtke ○ February 3, 2006 – Serono Labs’ Response to the Amended Complaint due ○ March 17, 2006 – Plaintiffs’ Opposition to Responsive Motion due ○ April 6, 2006 – Serono Labs’ Reply to Opposition due • October 31, 2005 – Order case consolidated with 01-cv-12257

